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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
C.A. No. 04-CV-11069-JLT

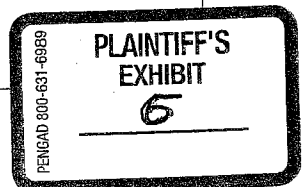
ABRAHAM PHILIP, M.D.,)
Plaintiff)
)
vs.)
)
)
JOHN CRONIN, in his personal)
capacity,)
Defendant)

DEPOSITION of JOHN CRONIN,
a witness called on behalf of the
Plaintiff, pursuant to the applicable
provisions of the Federal Rules of Civil
Procedure, before Judith R. Sidel,
Professional Court Reporter and Notary
Public, in and for the Commonwealth of
Massachusetts, at the Office of the
Chief Medical Examiner, 720 Albany
Street, Boston, Massachusetts 02118, on
Wednesday, June 22, 2005, commencing at
10:10 a.m.

APPEARANCES: (Continued on page 2)

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1 located in the administrative pool of
2 our office. I can't recall actually the
3 exact time when it was handed to me, but
4 it was certainly within a day of receipt,
5 I assure you of that.

6 Q. Now, were either of these letters
7 discussed at all during your
8 collaboration on the letter of
9 termination to be sent to Dr. Philip?

10 A. Yes, sir.

11 Q. Do you recall which of those letters
12 was discussed during your collaboration
13 about the termination letter to be sent
14 to
15 Dr. Philip?

16 A. As I mentioned earlier in my testimony,
17 the meeting held with members of the
18 executive office and medical examiner
19 staff discussed that these particular
20 pieces of correspondence had been
21 received by our office. The essence of
22 our discussion was simply, one, first
23 on the matter of Exhibit 5 and 6 that
24 what appear to be Dr. Philip's detailed

1 description of problems at the Office of
2 the Chief Medical Examiner was largely
3 redundant and and/or rhetorical up to
4 three commissioned audit and review
5 reports that the agency had received in
6 the last several years.

7 And that the matter of Exhibit
8 No. 7, which apparently arrived a day or
9 so later, was a product of Dr. Philip's
10 opinion on the medical procedure
11 involving a case that had processed
12 through our system, and I recall in that
13 discussion, Attorney Sharp, that folks
14 were informed that it was identical to
15 an e-mail that Dr. Philip had sent out
16 to our medical examiner staff several
17 days or weeks prior to apparently sending
18 it to Governor Romney. We were concerned
19 also that Dr. Philip had potentially
20 discussed or had written about a case,
21 and I'm not quite certain at the time
22 if the name had been redacted on its
23 deliverance to us and/or the Governor,
24 and we were concerned the confidentiality